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*Counsel to the Official Committee of
Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Chapter 11
)	
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,)	Case No. 22-10943 (MEW)
)	
Debtors. ¹)	(Jointly Administered)
)	
)	Re: ECF No. 383
_____)	

**CERTIFICATE OF NO OBJECTION REGARDING
APPLICATION FOR ORDER AUTHORIZING THE EMPLOYMENT AND
RETENTION OF CASSELS BROCK & BLACKWELL LLP AS CANADIAN COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
VOYAGER DIGITAL HOLDINGS, INC., *ET AL.*, EFFECTIVE AS OF JULY 29, 2022**

Pursuant to 28 U.S.C. § 1746, Rule 9075-2 of the Local Bankruptcy Rules for the
Southern District of New York (the “Local Bankruptcy Rules”), and in accordance with the
Notice of Application for Order Authorizing the Employment and Retention of Cassels Brock

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Voyager Digital Holdings, Inc.’s and Voyager Digital Ltd.’s principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003. Voyager Digital, LLC’s principal place of business is 701 S. Miami Ave, 8th Floor, Miami, FL 33131.

& Blackwell LLP as Canadian Counsel to the Official Committee of Unsecured Creditors of Voyager Digital Holdings, Inc., et al., Effective as of July 29, 2022 [Docket No. 383] (the “Notice”), the undersigned counsel for the Official Committee of Unsecured Creditors of Voyager Digital Holdings, Inc., *et al.* (the “Committee”) in the above-captioned chapter 11 cases hereby certifies as follows:

1. On September 7, 2022, the Committee filed the *Application for Order Authorizing the Employment and Retention of Cassels Brock & Blackwell LLP as Canadian Counsel to the Official Committee of Unsecured Creditors of Voyager Digital Holdings, Inc., et al., Effective as of July 29, 2022* [Docket No. 383] (the “Application”).

2. The Notice and Application were served by undersigned counsel to the Committee as reflected in the certificate of service attached to and filed with the Notice and Application.

3. Pursuant to the Notice, the deadline for parties to object or file responses to the Application was October 11, 2022 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

4. Local Rule 9075-2 provides that the Application may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable objection deadline and (b) the entity that filed the Application complies with such rule.

5. As of the filing of this certificate, more than forty-eight (48) hours have elapsed since the Objection Deadline, and the undersigned counsel hereby certifies that as of the date hereof, no objection or other response to the Application has been filed or served pursuant to the Notice.

6. Accordingly, the undersigned counsel requests entry of the proposed order attached hereto as **Exhibit A** (the “Proposed Order”) at the Court’s earliest convenience.

7. If not entered prior to the hearing, the Committee will seek entry of the proposed order at the telephonic-only hearing scheduled for 2:00 p.m., prevailing Eastern Time, on October 19, 2022, before the Honorable Michael E. Wiles, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York
October 14, 2022

MCDERMOTT WILL & EMERY LLP

/s/ Darren Azman

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